

From: Fox, Bruce
Sent: Monday, July 6, 2020 8:26 PM
To: 'Corl, Christina'
Cc: Chen, Qiwei; Horowitz, Andrew
Subject: RE: Huang v. OSU- Conferral Letter

If you need some additional time, there is less urgency now with the postponement of near term depositions. And of course if there are any health issues regarding your husband, we have no problem granting additional time. Hope all goes well with the surgery.



Bruce C. Fox

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From: Corl, Christina <CCorl@plunkettcooney.com>
Sent: Monday, July 6, 2020 10:35 AM
To: Horowitz, Andrew <Andrew.Horowitz@obermayer.com>
Cc: Fox, Bruce <bruce.fox@obermayer.com>; Chen, Qiwei <qiwei.chen@obermayer.com>
Subject: RE: Huang v. OSU- Conferral Letter

Counsel, I will do my best. I'm out of town for depositions this week AND my husband is having a very serious surgery on Thursday. The reasons for my reluctance to confer by phone were further reinforced by Plaintiff's recent communication to the court about our mediation conference.



Christina L. Corl

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From: Horowitz, Andrew <Andrew.Horowitz@obermayer.com>
Sent: Monday, July 6, 2020 10:30 AM
To: Corl, Christina <CCorl@plunkettcooney.com>
Cc: Fox, Bruce <bruce.fox@obermayer.com>; Chen, Qiwei <qiwei.chen@obermayer.com>
Subject: RE: Huang v. OSU- Conferral Letter

[EXTERNAL]

Counsel,

If it helps, please respond by close of business Wednesday. I realize that this is a tight deadline, but let me reiterate that we believe that this process could be expedited if you would be willing to confer by phone, which we believe you are obligated to do under the applicable local rule. I understand that it is your strong preference to do this in writing, which we will accommodate as long as it does not cause unnecessary delay.

Thank you.

Andrew J. Horowitz, Esquire

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From: Corl, Christina <CCorl@plunkettcooney.com>
Sent: Monday, July 6, 2020 7:21 AM
To: Horowitz, Andrew <Andrew.Horowitz@obermayer.com>
Cc: Fox, Bruce <bruce.fox@obermayer.com>; Chen, Qiwei <qiwei.chen@obermayer.com>
Subject: RE: Huang v. OSU- Conferral Letter

Counsel, we acknowledge Plaintiff's cancellation of Jonathan Parry's deposition.

It will not be possible to respond to the issues in Plaintiff's second conferral letter by tomorrow.



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From: Horowitz, Andrew <Andrew.Horowitz@obermayer.com>
Sent: Thursday, July 2, 2020 7:16 PM
To: Corl, Christina <CCorl@plunkettcooney.com>
Cc: Fox, Bruce <bruce.fox@obermayer.com>; Chen, Qiwei <qiwei.chen@obermayer.com>
Subject: Huang v. OSU- Conferral Letter

[EXTERNAL]

Please see attached and provide a response by close of business on Tuesday, July 7, 2020.



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